

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

The Estate of Zerihun Wolde, individually
and as assignee and Lacks Beach Service,
individually and as assignor,

Plaintiffs,

vs.

Arch Specialty Insurance Company, Arch
Insurance Company, and Arch Insurance
Group, Inc.,

Defendants.

Case No.: 4:23-cv-03710-JD

**PLAINTIFFS' DISCLOSURE OF EXPERT
WITNESSES**

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and the First Amended Conference and Scheduling Order, Plaintiffs certify that a written report prepared and signed by the expert listed below has been disclosed to all other parties and that the report complies with the requirements of Rule 26(a)(2)(B). Plaintiffs reserve the right to supplement their disclosures and reports as discovery progresses, particularly due to the Arch Defendants' and several non-parties' failures to produce claim files and other relevant and discoverable materials in this case.

1. Louis G. Fey Jr., CPCU, CIC, CRM, AIC
2136 N. Woodchase Court
Baton Rouge, LA 70808
(225) 362-0018

Louis Fey is an expert in insurance industry standards and practices applicable to liability insurance claims handling and will provide testimony consistent with the opinions in his report, including any supplements or amendments thereto.

Plaintiffs reserve the right to designate a responsive/rebuttal expert to any expert Defendants designate after this date. Plaintiffs also reserve the right to call any expert witness who

may be required to substitute for another expert listed herein in the event that the listed expert becomes unavailable to testify at trial due to circumstances beyond Plaintiffs' control. Plaintiffs reserve the right to elicit opinion testimony from any fact witnesses to the extent qualified based on their knowledge, training, education, and/or experience. Finally, Plaintiffs reserve the right to supplement this list prior to the trial of this case.

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May 15, 2024

Charleston, South Carolina